

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI

IN RE: NATHANIEL STEELE and LATESSA R. STEELE CHAPTER 13  
Debtors CASE NO. 11-14174-JDW

CANNON MOTOR COMPANY  
D/B/A CASH UNLIMITED, INC.  
Creditor

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RESPONSE TO MOTION TO MODIFY PLAN

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COMES NOW, CANNON MOTOR COMPANY D/B/A CASH UNLIMITED, INC.,  
Creditor, through counsel, and files this RESPONSE TO MOTION TO  
MODIFY PLAN, and in support thereof, would respectfully state  
unto the Court as follows:

1. Paragraph No. I of the said Motion is admitted.
2. Paragraph No. II of the said Motion is admitted.
3. This Creditor is without information or knowledge sufficient to form a belief as to the truth of the matters contained in Paragraph No. III of the said Motion. This Creditor demands strict proof.
4. This Creditor demands that the Debtors' requests in Paragraph No. IV of the said Motion be denied, unless there is a requirement that the remaining unpaid secured claim of this Creditor be paid in full from the proceeds of any such transaction, and unless the Court is able to

resolve the Trustee's valid objections to the said Motion as set forth in Paragraph Numbers 5 and 6 of the Trustee's Response to Debtors' Motion. Said Paragraph Numbers 5 and 6 are incorporated herein by reference thereto as if fully copied herein.

**WHEREFORE, PREMISES CONSIDERED,** Creditor respectfully moves that the Court determine the merits of the Debtors' Motion to Modify based upon evidence presented at a full hearing of this matter, and render a decision that is both just and equitable in accordance with the U.S. Bankruptcy Code and applicable law. This Creditor prays for such other, general, and further relief to which it may be entitled.

Respectfully submitted,

**CANNON MOTOR COMPANY  
D/B/A CASH UNLIMITED, INC.  
CREDITOR**

BY: /s/William J. Davis  
William J. Davis  
Attorney at Law  
228 Thornton Drive  
Pope, MS 38658  
(662) 563-8186  
MSB# 5988

**CERTIFICATE OF SERVICE**

William J. Davis, Attorney for Creditor, do hereby certify that I have this day served a true and correct copy of the above and foregoing **RESPONSE TO MOTION TO MODIFY** by U.S. Mail, postage prepaid, and/or electronically via ECF to the following:

U.S. Trustee	Locke D. Barkley	Hon. Tarik Johnson
501 East Court St.	Chapter 13 Trustee	Attorney for Debtors
Suite 6-430	P.O. Box 55829	P.O. Box 1044
Jackson, MS 39201	Jackson, MS 39296-5829	Grenada, MS 38902-1044

This the 12<sup>th</sup> day of August, 2013.

/s/William J. Davis  
William J. Davis  
Certifying Attorney